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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996	)	CC Docket No. 96-128

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PETITION OF NJPA FOR PARTIAL RECONSIDERATION AND CLARIFICATION

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TABLE OF CONTENTS

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SUMMARY

The New Jersey Payphone Assocation ("NJPA") requests reconsideration of portions of the Order addressing nondiscrimination requirements and nonstructural safeguards for Bell company and other local exchange carrier ("LEC") payphone operations.

Section 276(a)(2) of the Act prohibits all discrimination by the Bell company between its own payphone services and independent payphone service providers ("PSPs"). First, the Commission should clarify that this provision and Section 202 of the Act require Bell companies and other LECs to ensure that the coin services they offer to independent PSPs allow rating of calls at rates selected by the PSP, just as the coin service provided to the LEC's own payphones allows rating of calls at rates selected by the LEC's payphone division. In the case of the Bell companies, discriminatory call rating capabilities would violate both the express terms of Section 276 and the Commission's comparably efficient interconnection ("CEI") principles, which are the minimum safeguards applicable to Bell company payphone operations.

Second, the Commission should rule that all LECs are required to offer answer supervision on an unbundled basis. Reasonably priced answer supervision is essential in

order to ensure (1) that coins are collected for completed calls, and (2) that coins are not collected for uncompleted calls.

Third, the Commission should clarify that LECs are required to make network-based call tracking available for calls made from independent payphones if they make it available for calls made from their own payphones. LEC tracking services are important to ensure that PSPs have a means of checking the accuracy of compensation payments received from carriers, and also to ensure that carriers that lack tracking capability can purchase an effective alternative capability. Such essential services, if provided for the LEC's own payphones, clearly must be available on equal terms for independent payphones.

Fourth, the Commission should clarify that intraLATA 0+ commissions must be available to PSPs on a nondiscriminatory basis. This requirement not only prevents discrimination but discourages subsidy of LEC payphone services.

Fifth, the Commission should reconsider or clarify its ruling on other non-tariffed services to make clear that joint marketing, installation and maintenance, and billing and collection all must be provided without discrimination and priced to independent PSPs on an allocated cost basis.

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To: The Commission

PETITION OF NJPA FOR PARTIAL RECONSIDERATION AND CLARIFICATION

The New Jersey Payphone Association ("NJPA") hereby petitions for partial reconsideration and clarification of the Commission's Report and Order in this proceeding, FCC 96-388, released September 20, 1996 ("Order"). NJPA is a non-profit organization of competitive non-local exchange carrier ("non-LEC") payphone providers which provide pay telephone service to New Jersey customers.

NJPA affirmatively supports many aspects of the Commission's Order, which establishes a number of important and fair policies to guide the future of the competitive payphone industry. In this petition for reconsideration, we request reconsideration and clarification of a few portions of Sections III.A. and III.B. of the Order addressing nondiscrimination requirements and nonstructural safeguards for the deregulated payphone operations of the Bell companies and other LECs.

The plain meaning of Section 276(a)(2) of the Communications Act, 47 U.S.C. § 276(a)(2), prohibits all discrimination by the LEC between its own payphone services and independent payphone service providers ("PSPs"), and requires that all operating functions provided by LECs to their own payphone operations -- including coin line functions programmed with the PSP's coin rates, installation and maintenance services, and validation, billing and collection services -- be available to IPP providers on the same rates, terms and conditions.

This interpretation is supported by the Commission's interpretation of the closely similar language of the non-discrimination provision of Section 251 of the Act, 47 U.S.C. § 251(c)(2)(D),[1] in the First Report and Order in CC Docket No. 96-98, Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, FCC 96-325, released August 8, 1996, ("Local Interconnection Order") stayed in part pending review, Iowa Utilities Board v. FCC, Nos. 96-332 et al. (8th Cir., October 15, 1996). The Commission specifically compared the Section 251 language with the long-standing prohibition of Section 202 against "unjust or unreasonable discrimination," 47 U.S.C. § 202(a), and said:

> The nondiscrimination requirement in section 251(c)(2) is not qualified by the "unjust or unreasonable" language of section 202(a). We therefore conclude that Congress did not intend that the term "nondiscriminatory" in the 1996 Act be synonymous with "unjust and unreasonable discrimination" used in the 1934 Act, but rather, intended a more stringent standard. . . . We believe that the term "nondiscriminatory," as used throughout section 251, applies to the terms and conditions an incumbent LEC imposes on third parties as well as on itself.

---

[1] Section 251(c)(2)(D) states that interconnection shall be on rates, terms, and conditions that are just, reasonable, and nondiscriminatory . . . ." Section 276(a)(2) states that a Bell Company "may not prefer or discriminate in favor of its payphone service . . . ."

Local Interconnection Order, ¶¶ 218-19.

This same interpretation applies to the parallel language of Section 276(a)(2). The phrase "shall not discriminate" in Section 276 is also "not qualified by the 'unjust or unreasonable' language of Section 202(a)," and therefore imposes a "stringent standard" of equality on all the terms and conditions on which a LEC provides service to its own vs. independent payphone operations. Within that context, of course, the Commission has discretion to apply safeguards at or above the levels established in Computer III.[2]

I. NONDISCRIMINATORY AND UNBUNDLED ACCESS TO NETWORK SERVICE

A. Nondiscriminatory Access To Coin Control Services

In a key paragraph of the Order, the Commission ruled that:

> incumbent LECs must offer individual central office coin transmission services to PSPs under nondiscriminatory, public, tariffed offerings if the LECs provide those services for their own operations.

Order, ¶ 146. This critical ruling promises to end decade-long practices of discrimination that have precluded independent PSPs from gaining whatever efficiencies may be available from the use of the coin control functions of the LEC network. In order to ensure that this ruling has its desired effect, NJPA requests clarification that, if a LEC that provide their own payphone operations with central office coin services that rate coin calls at the rates selected for the

[2] For example, the Commission is free to apply its cost allocation rules when LEC employees perform installation and maintenance of the LEC payphone division's facilities. However, the LEC must then employ the same rules if an independent provider requests installation and maintenance for its facilities.

LEC's own payphones, the coin services offered to independent PSPs must rate calls at the rates selected by the independent PSP for its payphones.

As described in Notice of Proposed Rulemaking, FCC 96-254, released June 6, 1996, ¶ 43, the coin-operated functions of LEC payphones generally are controlled by signaling provided by the central office. Independent PSPs were denied access to these network control functions and therefore have relied on "smart" payphones, the coin functions for which generally are controlled by computer processors residing within the payphone. Part of the coin control function involves rating the call so as to determine what coins must be deposited before allowing call completion. The Order generally requires that coin control services be made available on a nondiscriminatory basis to all PSPs. However, the Order does not expressly state that coin line services offered to PSPs must allow all PSPs (not just the LEC payphone division) to select their own retail coin calling rates.

Coin service offerings that do not permit coin calls to be rated at any rates except those selected for the LEC's own payphones plainly discriminate in favor of the LEC payphone operation and against independent PSPs, who frequently choose to charge different coin rates from those charged at LEC payphones. For example, independent PSPs frequently charge a relatively low "postalized" toll rate of 25 cents per minute, or three minutes for $1.00, to promote coin calling and to simplify the coin deposits for toll calls. Independent PSPs also frequently charge either more or less than the LEC payphone division for local coin calls. With the deregulation of local coin rates as directed by the Commission's Order, there is likely to be more variation in coin rates in the future as market forces are brought to bear. Coin service that can only be used by PSPs that charge the retail rates selected by the LECs plainly discriminates against PSPs that have chosen to charge different rates.

In the case of Bell companies, such discrimination is plainly prohibited by the express terms of Section 276, which prohibit any discrimination in favor of the Bell company's own payphone service. 47 U.S.C. § 276(a)(2).

Even if such discriminatory coin service offerings by Bell companies were not prohibited by the express language of Section 276(a), they are clearly inconsistent with the nonstructural safeguards mandated by the Act, which at a minimum must equal those of Computer III. § 276(b)(1)(C). As the Order notes, these safeguards include comparably efficient interconnection ("CEI"), which at a minimum requires the regulated basic services utilized by the Bell companies to be fully unbundled from their nonregulated services and available to other competitors on the same terms and conditions as available to the Bell companies' nonregulated operations. See, e.g., Amendment of Section 64.702 of the Commission's Rules and Regulations (Third Computer Inquiry), 104 FCC 2d 958, 1036 (1986) (subsequent history omitted). In the payphone context, CEI requires, at a minimum, that the basic coin transmission services offered to PSPs on a regulated basis must be fully unbundled from the Bell companies' own nonregulated retail payphone services -- including the retail rates that the Bell companies' choose to offer at their own payphones.

In addition to being blatantly discriminatory in violation of Sections 276 and 202 of the Act, LEC coin service offerings that do not allow independent PSPs to select their own rates are contrary to the deregulatory policies established by the Order to promote competition in the payphone market. A LEC coin service that allows only one rate to be charged (i.e., the rate used by the LEC at its own payphones) plainly imposes a major obstacle to the development of a competitive payphone market. To the extent that there are efficiencies to be gained by utilizing network-based coin control services, these efficiencies will be available only at the cost of sacrificing the price variation capability that is the traditional hallmark of a competitive market. Any independent PSP that wishes to charge a different rate from the rates charged at LEC payphones would be able to do so only by continuing to use "smart" payphones with the rate tables included within the payphone, an arrangement that may be less efficient than use of a "dumb" payphone and a coin service line.

In the case of non-Bell LECs, the Commission's Order requires those LECs as well to offer coin service on a nondiscriminatory basis, as a consequence of Section 202 of the Act and the application of Computer II CPE deregulation principles to those LECs. Therefore, both the Bell companies and other LECs must offer coin transmission services on a fully nondiscriminatory basis that enables PSPs to select their own retail coin rates.

Such individualized coin rating is clearly feasible for LECs to offer. While Ameritech claimed in its comments that such individualized coin rating was not practical, Ameritech itself is currently offering such a service, known as "Profitmaster," to independent PSPs. See GPCA Reply Comments at 5, Att. 1. See also Attachment 1 to this Petition. The "Profitmaster" service is a form of interconnection that provides functionality comparable to the coin lines used by Ameritech's own payphones, and also has the capability of being individually programmed with rate tables. However, Profitmaster apparently uses a different interface from that used for Ameritech's own payphones. The Commission should clarify that, under CEI principles, the price of the Profitmaster offering should be averaged with the price of the LEC's own coin line offering to ensure that competitors are not disadvantaged by being forced to accept a higher-priced form of interconnection. Computer III, 104 FCC 2d at 1050.

Therefore, the Commission should clarify that LECs are required to offer coin rating services that enable independent PSPs to select the coin rates charged to end users at their payphones.

B. Unbundled Access To Answer Supervision

The Commission declined to require that "other network services and network elements should be unbundled and provided to payphone providers," except that the Bell companies will be required to unbundle additional network elements "when requested by payphone providers based on the specific criteria established in the Computer III and ONA proceedings." Order, ¶147. NJPA requests limited reconsideration of this ruling to the extent that it does not require the provision of answer supervision to independent PSPs as an unbundled element of the service offered by LECs to their own payphones.

Answer supervision is a critical element, the absence of which significantly detracts from the ability of independent PSPs to provide accurate billing of customer calls. Comments of GPCA at 6. Without "true" network-based answer supervision from the network, PSPs must rely on various relatively imprecise methods to determine when a call has been answered. The unavailability of "true" answer supervision can result in the retention of coins on uncompleted calls (a source of significant consumer dissatisfaction) or failure to collect coins on completed calls (resulting in significant financial loss to the PSP). Thus, answer supervision is as fundamental to the payphone business as it is to the long distance business, where true answer supervision was a basic component of the "equal access" requirements of the AT&T consent decree. Failure to provide answer supervision to PSPs as an unbundled element that may be ordered independently of other coin control functions has the effect of forcing any PSP that desires true answer supervision to purchase all other coin control functions utilized by the LEC for its own payphones, even though the PSP's equipment may already provide these other coin control functions in a perfectly acceptable manner.

It is apparent that the provision of true answer supervision is feasible for LECs. Answer supervision is currently offered by various LECs in a number of jurisdictions.[3] NJPA believes that the withholding of this feasible unbundled offering from PSPs is, under the circumstances, a clear instance of unlawful discrimination under Section 276(a). However, even if the withholding of unbundled answer supervision is not per se discriminatory, the Commission should in this instance exercise its discretion to exceed the minimum Computer III requirements to the extent necessary to ensure universal availability of this essential function on an unbundled basis.

Accordingly, NJPA urges the Commission to reconsider or clarify its decision and rule that answer supervision should be required of all LECs, and that PSPs need not await the results of ONA processes in order to obtain answer supervision.

[3] Generally, however, the tariffed price of answer supervision, where available, is so high that it is generally uneconomical and thus not yet a popular offering among PSPs.

II. OTHER SERVICES

A. Call Tracking

NJPA requests the Commission to clarify that LECs are required to make network-based call tracking available for calls made from independent payphones if they make it available for calls made from their own payphones. In discussing this issue, which was initially raised in the Comments of GPCA (at 13), Paragraph 149 of the Order states that "[w]e have already addressed above the per-call tracking requirements." Order, ¶ 149. This is an apparent allusion to Section I of the Order, which addresses compensation, where the Commission states:

> We decline to require LECs or PSPs to perform per-call tracking themselves. Neither LECs nor PSPs are the primary economic beneficiaries of payphone calls. We conclude, however, that LECs, PSPs, and the carriers receiving payphone calls should be able to take advantage of each other's technological capabilities through the contracting process.

Order, ¶ 97. While this portion of the Order allows LECs to choose not to offer tracking services at all, it does not address the LECs' obligation to be nondiscriminatory in any per-call tracking services they do provide.

For essentially the same reasons that LECs are required to be nondiscriminatory in their provision of central office coin services (see above), the LECs must also be nondiscriminatory in any tracking services they do provide, and may not provide tracking services for their own payphones without also making the same services available for independent payphones.

LEC tracking services are important to PSPs for at least two reasons. First, while the Order requires IXCs (or in some cases LECs, when they are the primary economic beneficiary of the call) to track calls subject to compensation for purposes of paying compensation to PSPs, it is important for PSPs to have a means of checking on the accuracy of the call volumes on which they are paid by each carrier. However, an accurate determination of the number of compensable calls routed to each carrier cannot be made by PSPs without assistance from LECs. For example, a PSP's call detail report may inform it that a subscriber 800 call has been made to a particular 800 number at a particular time, but the PSP's call data will not tell it which carrier handled that 800 call. That information is available to the LEC, however, because the LEC has access to the 800 number data base that determines the proper routing of the call. Thus, the LEC is able to track which 800 calls have been routed to which carriers, and presumably will do so in order to ensure that its own payphone division is properly compensated for 800 calls. The same tracking must be made available to independent PSPs in order to ensure that independent PSPs have a comparable ability to check the accuracy of compensation payments, and thus to avoid discrimination that violates Sections 276 and 202 of the Act.

Second, as noted in the Order, to the extent that carriers that are primary economic beneficiaries of compensable calls find it difficult or expensive to provide their own tracking, they can choose to contract with LECs to track the calls. Order, ¶ 97. If LECs make tracking available to these carriers for calls originating from their own payphones, but make no tracking (or inferior tracking) available for calls originating from independent payphones, independent payphones are less likely to receive timely and accurate payments for compensable calls. As with LEC tracking services provided to PSPs, LEC provision to carriers of tracking services that "prefer or discriminate in favor of its own payphone service" would violate Sections 202 and 276 of the Act. 47 U.S.C. § 276(a)(2).

B. 0+ Commissions

The Order does not make clear whether LECs are required to make available, on a nondiscriminatory basis, any commission payments provided to their own payphone divisions in return for the presubscription of operator service traffic to the LEC. Commissions are typically paid by operator service providers ("OSP") to presubscribed PSPs as a percentage of the operator service revenues derived from the traffic received from the presubscribed payphones. In the past, identification of a commission paid by the LEC to itself for traffic from its own payphones has been obscured by the integration of payphone services with the LEC's other regulated services. However, with the deregulation of LEC payphones, payment of commissions for, e.g., intraLATA and local 0+ traffic is likely to become a vehicle whereby a LEC can increase the profitability of its nonregulated payphone business at the expense of its own ratepayers.

Such commission payments are not subject to routine tariff review. The Common Carrier Bureau has ruled that carriers are not required to tariff their commission payments. National Telephone Services, Inc., 8 FCC Rcd 654 (Com. Car. Bur. 1993), applications for review pending (filed March 3, 1993). To the extent that there is also no routine supervision of commission levels at the state level, LECs could use inflated commission payments as a mechanism for shifting profits to nonregulated activities. Unjustifiably high commission levels would not only constitute an illegal subsidy in violation of Section 276(a), but also would be illegally discriminatory in violation of Section 276(b). Thus, NJPA seeks a ruling that the Commission will review and take jurisdiction of claims of unreasonable or discriminatory commission practices by the LECs.

Further, given the likely incentive for LECs to pay such inflated commissions, and the current lack of any administrative vehicle for regularly reviewing LEC commission levels, the Commission should exercise its jurisdiction at least to the extent of establishing a guideline that provides an incentive for LECs to avoid inflated and discriminatory commission levels. NJPA does not contend that commission levels must be the same for the 100,000+ payphones controlled by a Bell company as for a single "Mom-and-Pop" operated payphone. However, there is clearly a level beyond which there is no reasonable market justification. As proposed in GPCA's Reply Comments (at 12-13), the Commission should rule that, in order to be nondiscriminatory, the highest level of commission payment offered by the LEC should be available to aggregators of IPPs that yield a level of traffic volume or revenue that is equal to one-third of total IPP operator service traffic or revenue.

C. Services To Be Provided On A Cost Allocated Basis

Paragraph 149 of the Order requires that various nontariffed services that LECs provide to their own payphone divisions should be available to other PSPs on a nondiscriminatory basis. However, the Commission declined to require that joint marketing services be provided to other PSPs on a nondiscriminatory basis. In addition, the Order leaves it ambiguous to what extent installation and maintenance services and billing and collection services must be provided to PSPs without discrimination.

The Commission's rationale for declining to require nondiscriminatory provision of joint marketing is that:

> We have concluded that the market for payphone CPE is competitive and LECs do not have any specific advantage in marketing payphone services in a deregulated payphone market. LEC personnel or affiliates will have to market to payphone location providers in the same manner as other payphone providers to obtain payphone locations.

Order, ¶ 149. NJPA believes that LECs do have significant advantages in marketing payphone services because of their control of the local exchange facilities on which payphones depend. For example, when a customer orders a regular business line to connect a new location or phone system to the network, the LEC immediately has an opportunity to begin marketing to that customer as a potential payphone location provider. However, regardless of the extent of a LEC's marketing advantage, Section 276 provides that Bell companies, at least, "shall not prefer or discriminate in favor of its own payphone operations." 47 U.S.C. § 276(a)(2). As discussed above, this requirement is unqualified. Even discrimination that is arguably "just" or "reasonable" is not permitted, and the prohibition is not limited to discrimination that occurs with regard to tariffed services. Therefore, where the same Bell company employees that market regulated service also market nonregulated payphone service, with costs allocated to the nonregulated side based on relative time expenditures or other factors, that same marketing opportunity should be made available to independent PSPs, with billing of PSPs on an allocated cost basis.

In the case of installation and maintenance, the Order states that "installation and maintenance of basic payphone services should be available to other providers of payphone services on a nondiscriminatory basis." Order, ¶ 149. It is not clear whether "basic payphone services" refers to the regulated access services connected to payphones or to the payphone equipment and facilities themselves. NJPA requests clarification or reconsideration, as appropriate, to rule that this requirement applies to installation and maintenance ("I&M") of payphones themselves. LECs clearly have a "specific advantage" in the I&M of payphone equipment and wiring, to the extent that they are allowed to use the same technical personnel for I&M of their payphones and inside wire as well as for I&M of the wiring on the network side of the demarcation point. If a LEC technician provides I&M on the same visit for a LEC payphone or payphone inside wire as well as the payphone line, or if the LEC technician provides I&M for the LEC payphone on the same trip on which he or she provides scheduled maintenance for other residential or business lines, that technician should also be available to maintain IPPs on the same terms and conditions. Thus, if the LEC payphone operation is "billed" for the payphone I&M on an allocated cost basis, similar maintenance should be available to IPPs on an allocated cost basis.

Finally, the Commission should clarify or reconsider its ruling on billing and collection services. The Order states that:

> if a LEC provides basic, tariffed payphone services that will only function in conjunction with billing and collection services from the LEC, the LEC must provide the billing and collection services it provides to its own payphone operations for these services to independent payphone providers on a nondiscriminatory basis.

Order, ¶ 149. Coin services are provided as an example of such a billing and collection service. Again, however, the limitation to services that are necessary to the functioning of a tariffed service is not justified. As a practical matter, IPP providers that provide their own operator services are highly dependent on the billing and collection services of the LEC. Further, Section 276(a)(2) does not differentiate between tariffed and nontariffed services. Therefore, notwithstanding that the Commission has deregulated billing and collection service, the Commission must require that LECs not discriminate in the provision of such services to their own payphone operations and independent PSPs. To the extent that LEC payphone operations use the LEC's billing and collection services, those services must be made available to independent PSPs and priced on an equivalent allocated-cost basis.

CONCLUSION

In summary, NJPA requests limited reconsideration and clarification of the Order as set forth above.

Dated: October 21, 1996

Respectfully submitted,

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ATTACHMENT 1

DESCRIPTIVE MATERIAL AND TARIFF PAGES FOR AMERITECH'S "ProfitMaster" SERVICE

Information Industry Services
23500 Northwestern Highway, A 106
Southfield, MI 48075

Ameritech

July 8, 1996

Dear Independent Payphone Provider:

Here's a summer special on ProfitMasterTM from Ameritech that's too good to pass up!

Order a minimum of ten (10) lines from July 15 through August 14, 1996, and Ameritech will waive the first month of the recurring charge for each line.* You'll also be eligible for a free one-day training class on the ProfitMaster software.

By linking you to Ameritech's intelligent payphone services network, ProfitMaster eliminates the need for costly "smart phone" equipment. You can expand and grow your business rapidly with up to three lower-cost traditional phone sets for the same investment you'd make in one "smart" phone. More phones at more locations mean more revenues for you.

You'll also save on day-to-day costs. The intelligence in the ProfitMaster platform helps reduce or eliminate many ongoing costs, such as administration and labor to maintain phones, daily phone polling, inventory of costly phone replacements and rate table purchases. Since ProfitMaster automatically updates the system with new area codes and NXXs, you will save significant additional costs.

The improved answer supervision that is part of the ProfitMaster service provides many ways to protect your revenues on both domestic and international calls. ProfitMaster reduces coin refunds and trouble requests, allows a higher call completion ratio, provides greater management efficiencies in coin collections and eliminates clip-on fraud.

ProfitMaster has expanded to additional service areas. You will find ProfitMaster now available in 12 central offices in Illinois. If you'd like more information about ProfitMaster or about Ameritech's reduced rates for volume and term commitments, please contact your Ameritech Information Industry Services account manager at 1-800-200-0710. To place an order, please call your Independent Payphone Provider service representative at 1-800-924-3666.

But don't wait. . .After August 14, it will be too late to take advantage of this special offer!

Sincerely,
Linda Karaba
Linda Karaba
IPP Product Manager

*For lines purchased under tariff terms, the first month's recurring charge of $17.50 per line will be waived. For lines purchased under contract, the contractual monthly rate will be waived for the first month.

"Profit Master" Feature Description

Coin Control For Collection, Return, and Recognition

Monitors signals from the payphone to identify when coins are deposited. Identifies the status (via line-side answer supervision) of the attempted call and sends a signal to the payphone to collect the coins if the call is completed or return the coins if the call is not completed.

Coin Box Accounting/Coin Box Full Indicator

Tracks the coins deposited in the payphone and allows the IPP to access this information remotely. Revenue detail will be provided by coin type (quarters, dimes, nickels). Sends three levels of alarms indicating volume of coins in coin box.

Low Usage Alarms

Provides an indicator for any phone which has usage below a level specifies by the IPP. "PROFIT MASTER" will call phone number designated by IPP to notify of potential out of service condition.

Flexible Rating

Allows the IPP to customize the rates charged by payphone for all calls including time of day discounts, if desired. (the IPP is responsible to insure rates meet applicable tariff requirements)

Local Call Timing

Allows the IPP to limit the call length for local coin calls (the IPP is responsible to insure it complies with applicable tariffs).

Pre-Prompting For Overtime

Allows the IPP to collect coins for overtime periods of conversation time prior to insure payment is met.

Free Calls

Allows free calls to IPP-specified numbers such as 411, 911 or the IPP's office.

Time Of Day Restrictions

Allows IPP to block coin calls or incoming calls during specific hours. Or, the IPP can restrict phone to 911 calls only. Primary application be high crime urban areas concerned with the use of payphones by drug dealers.

FLEXIBLE ROUTING OF 0+, 0- AND 1+ CALLS

Allows the IPP to select multiple interexchange carriers for local, intra and interLATA calls for direct dialed and operator handled calls.

SPEED DIAL

Allows up to 10 speed dial numbers.

ABILITY TO BLOCK CALLS BASED ON DIGITS DIALED

Allows IPP to block specific numbers such as 976 and pager numbers.

ANNOUNCEMENTS

Provides 28 standard announcements providing the payphone user with dialing instructions such as the deposit required for long distance calls or prompts for overtime payments.

OTHER BENEFITS

ELIMINATES CLIP-ON FRAUD

Because the intelligence is located in the CO, not the payphone, "crooks" are unable to gain access with a "butt set" tapping in behind the payphone.

ILLINOIS BELL TELEPHONE COMPANY
By D. H. Gebhardt, Vice Pres. - Reg. Affairs
225 West Randolph Street
Chicago, Illinois 60606
Issued: February 1, 1995

Effective: February 2, 1995

- TELECOMMUNICATIONS SERVICES -

PART 15 - COMPETITIVE SERVICES
Section 27 - Ameritech ProfitMaster Service (N)

1. Description

A. Ameritech ProfitMaster Service is available as an optional service for use in conjunction with Independent Payphone Provider (IPP) telephone service or Customer Owned Pay Telephone Service (COPTS). (hereinafter referred to collectively as "IPP"). Ameritech ProfitMaster Service is classified as a competitive telecommunications service.

B. Ameritech ProfitMaster Service is based on a central office platform which offers features for use with coinless or coin operated (payphone) telephone service. ProfitMaster uses a software driven system to provide features and capabilities similar to those provided by micro-processor based, "smart", payphone sets.

C. The IPP customer is provided with certain management capabilities through remote access to their payphones. ProfitMaster allows the IPP customer to perform functions such as management of rating database, collection of billing records and software downloads.

2. Basic Feature Package

A. Coin box accounting and coin box full indication - tracks the coins deposited in the payphone and allows the IPP to access this information remotely.

B. Coin control for collection, return, and recognition - monitors signals from the payphone to identify when coins are deposited. This feature identifies the status of the attempted call and sends a signal to the payphone to collect the coins when the call is completed or return the coins when the call is not completed.

C. Flexible routing - provides for routing flexibility of 0+, 0-, and 1+ calls. This feature allows the IPP to select the carrier for intraLATA and/or interLATA calls, for both direct dialed and operator handled calls.

D. Flexible rating - allows the IPP the ability to customize the rates charged from its payphones, such as by time of day and day of week.

E. Call blocking - allows the IPP to block calls based on digits dialed. Specific numbers such as 976 and pager numbers can be blocked through the use of this feature.

F. Announcements - provides standard announcements used with payphone telephone service. Announcements such as deposit required for long distance calls, amount of overtime credit, and additional deposits required are provided by this feature.

G. Local call timing - allows the IPP the ability to limit the length of local coin calls.

H. Pre-prompting for overtime - allows the IPP to prompt the end user for additional deposits required for overtime periods of conversation time, prior to the end of time limit, and call cut off if deposit is not received. (N)

ILLINOIS BELL TELEPHONE COMPANY
By D. H. Gebhardt, Vice Pres. - Reg. Affairs
225 West Randolph Street
Chicago, Illinois 60606
Issued: February 1, 1995

ILL. C. C. NO. 5
PART 15 - Section 27
Original Page 2

Effective: February 2, 1995

- TELECOMMUNICATIONS SERVICES -

PART 15 - COMPETITIVE SERVICES
Section 27 - Ameritech ProfitMaster Service (N)

3. Rules and Regulations

A. The customer shall be responsible for all rules and regulations associated with the provision of IPP service as covered under other parts of this tariff.

B. The customer assumes sole responsibility for compliance with local, state, and federal regulations governing the provision of IPP service and the use of IPP sets.

C. The customer shall be responsible for payment of charges of all messages originating from or accepted at this type of service.

D. Where any customer-provided pay telephone is in violation of the provisions of this tariff, the company will promptly notify the customer of the violation and will take immediate action, as deemed necessary to correct violation, including termination of service.

E. Suspension of service is not available for Ameritech ProfitMaster Service.

F. Ameritech ProfitMaster Service is available only where facilities permit.

4. Rates and Charges

Ameritech ProfitMaster Service is an optional service offered to Independent Payphone Providers or Customer Owned Pay Telephone service providers. Rates and charges associated with Customer Owned Pay Telephone Service, including usage charges, also apply as shown in PART 2, Section 2, Paragraph 5 of this tariff. Additionally, service charges as shown in PART 1, Section 6 of this tariff also apply.

	Initial Nonrecurring Charge	Monthly Rate	
Per network access line equipped with ProfitMaster - with Basic feature package. /CFO/	$30.00	$17.50	(N)